GERDAU

February 27, 2012

International Compliance Assurance Division
Office of Federal Activities
Office of Enforcement and Compliance Assurance
US Environmental Protection Agency
Room 6144
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20004

CERTIFIED MAIL

RE: Annual Hazardous Waste Export Report

Please find attached our Annual Hazardous Waste Export Report as required under 40 CFR 262.56. Should you require any additional information, please contact me at the address or phone numbers listed below.

Sincerely,

Mike Cash
Environmental Engineer
Gerdau – Fort Smith Mill
P.O. Box 1592
Fort Smith, AR 72902-1592
Michael.Cash@gerdau.com
Phone: 479/648.5544
Fax: 479/648.5588
Cell: 479/651.3301

CERTIFIED MAIL™

7009 1410 0000 7048 7183

US POSTAGE
$ 05.75
Mailed From 72916
02/27/2012
031A 0005180229

GERDAU

Gerdau Special Steel North America
Fort Smith Mill
P.O. Box 1592
Fort Smith, AR 72902

Int'l Compliance Assurance Div.
Office of Federal Activities
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US Environmental Protection Agency
Room 6144
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20004

20460$0003 C000

7009141000007048718 3

Route: EPA Mail

To: Enforcement and Com

Mailstop: ARIEL RIOS NORTH

Department: 2254A

Phone:

PKG Condition Certified

2011 Annual Hazardous Waste Export Report

Exporter: Gerdau – Fort Smith Mill
5225 Planters Rd.
P.O. Box 1592
Fort Smith, AR 72902

EPA # ARD053730701

Contact: Mike Cash
Environmental Engineer
Phone Number: (479) 648-5544

Consignee: Zinc Nacional, SA
Serafin Pena 938 Sur
6400 Monterrey N.L. Mexico
Phone Number: 011-52-83400434

Waste Shipped: RQ, Hazardous Waste Solid N.O.S., Class 9, NA3077, PGIII, (K061) (Emission Control Dust/Sludge from Primary Production of Steel in Electric Furnaces) ERG #171

Quantity of Waste: 14,881,400 lbs. **Number of Shipments:** 81

Transporters: Fort Smith Railroad - US EPA ID Number - NED001792910
Union Pacific - US EPA ID Number - NED001792910

Waste Minimization: K061 is a byproduct from the melting and refining of steel scrap in Electric Arc Furnaces. The major component, which contributes to the toxicity of the waste, is lead. The typical lead content of K061 is approximately 5% compared to 1% for the K061 produced at our facility. The low lead content is due to the use of "clean" scrap in our operations. The volume of K061 produced per ton of steel produced, was reduced by approximately 10% in the early 1980's by changing the method by which lime is added to the furnaces. No other feasible technology is known which would further reduce either the toxicity or volume of K061 produced.

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Gerdau – Fort Smith Mill

2/27/12

Mike Cash
Environmental Engineer